

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

MARIA ALSINA ORTIZ,	*	CIVIL NO. 98-1893 (JAG)
AND/OR THE ESTATE OF MR.	*	
ORLANDO OCASIO ALSINA	*	
COMPOSE OF MARIA ALSINA	*	
ORTIZ	*	
	*	
PLAINTIFFS	*	PLAINTIFFS DEMAND TRIAL
	*	
VS.	*	
	*	BY JURY
MS. ZOE LABOY IN HER PERSONAL	*	
CAPACITY, DELFOS OCHOA	*	
HIS PERSONAL CAPACITY AND	*	
THE CONJUGAL PARTNERSHIP	*	
OR COMMUNITY PROPERTY	*	
CONSTITUTED BETWEEN ZOE	*	
LABOY AND DELFOS OCHOA;	*	
ET.AL.	*	
	*	
DEFENDANTS	*	
	*	
* * * * *	*	

EMERGENCY MOTION REQUESTING THE WITHDRAWAL OF FUNDS DEPOSIT

TO THE HONORABLE COURT:

COME NOW, Plaintiffs through their undersigned attorney,
and respectfully state and pray:

1. At docket 343 a settlement agreement was filed under
seal.

2. At docket 346 the Honorable Court issued a Judgment
according to the settlement agreement.

3. At docket 347 defendants filed a Motion to File Under
Seal requesting that the Motion to Consign Funds be filed under
seal. Plaintiff does not object that the motion be filed under

seal. The appearing party very respectfully requests to the Honorable Court to grant leave to file under seal the motion filed under seal.

4. Plaintiff hereby requests that the funds handed to the Clerk of this Honorable Court by defendants on this same date be allow to be withdrawn by plaintiff.

5. The appearing party requests to the Honorable Court to order to the Clerk of the Honorable Court to issue a check to the order of Maria Alsina and attorney Glenn Carl James for the amount stated in the motion filed under seal at docket 347.

6. This case was filed over 8 years ago. Plaintiff is in her gold age. Very respectfully, in order that she could obtain the funds to be issued during her short expectancy of life left; the appearing attorney requests that this motion be granted.

WHEREFORE, the appearing party very respectfully requests to the Honorable Court to order the Clerk of the Honorable Court to issue the check of the funds consigned to the order of Maria Alsina and attorney Glenn Carl James.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY: I hereby certify that on October 17, 2006 electronically filed the foregoing with the Clerk of the Court, using CM/ECF system which will send notification of such filing: mcanales_ydrach@zonai.com, elfrickmendez@yahoo.com, elfrick@hotmail.com, cjmoralesb@hotmail.com, rrs@caribe.net,

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In San Juan, Puerto Rico, this 17 day of October, 2006.

s/ Glenn Carl James
Glenn Carl James
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